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JOHN WILSON

BANKRUPTCY CHAPTER 13 ADV. PROCEEDING

Date	Description	Time/ Quantity	Total
04/25/2018	Prepared and filed a motion to reimpose the stay.	2.50	\$1,375.00
05/09/2018	read and reviwed the filing of Wells Fargo by their attorney Robert Griswold...	0.50	\$275.00
05/16/2018	Attended the court hearing for motion to reimpose stay..motion granted, the court asked to submit the order	2.20	\$1,210.00
05/20/2018	Reviewed the transactions the paperwork, deed power of attorney executed between the Wilson and Oumrow and notary of Oumrow family member, discussed with Ms. Johnson the reason for the transfers.	1.90	\$1,045.00
05/20/2018	researched into different bankruptcy filing by Oumrow, 19 Raymond court, 199 Nassau road, 349 Monroe House, pattern, pacer motions by or against him.	1.20	\$660.00
05/20/2018	Researched into possible claims, NYRPL 320 NYL 349, elements of fraud, conspiracy, unconscionability under the state law, unjust enrichment etc. Taking over the property without just cause or compensation. Sale for zero.	2.30	\$1,265.00
05/21/2018	Preparation of the complaint, research NYRPL 15, constructive trust, drafting of the complaint, pleading of the parties and their roles in the sham transaction to park the property—myth of moving property away from lender and completion of draft and filing.	5.90	\$3,245.00
05/24/2018	Summons receipts ECF issued by the Court, reviewed the dates: Answers by June 25, 2018 pretrail for July 17, 2018. Talk with Ms. Deslyn about the summons receipts and case progress.	0.50	\$275.00
05/25/2018	Printout of the summons, prepared the package sent them via fedex upon Oumrow and parties.	0.60	\$330.00
05/30/2018	Affidavit of service of the summons prepared and filed with the court.	0.60	\$330.00
07/03/2018	Summons service upon all defendants certification filed.	0.40	\$220.00
07/16/2018	Reviewed the file, read the complaint, prepared for the background made notes for the court preparation.	0.80	\$440.00
07/17/2018	Appeared in the court [judge puzzled with the facts and concerned], none appeared for Oumrow, court adjourned it to August 21, 2018.	3.00	\$1,650.00
08/21/2018	Spoke to Ms. Jackson and wrote a letter to judge adjournment to October 23, 2108, also advising of the court of the default by Oumrow.	0.50	\$275.00

10/23/2018	Prepared for the case, default and notes on the case.	0.60	\$330.00
10/23/2018	Appeared in the case, none appeared for Oumrow Singh. Judge questioned about them not appearing etc and issues with the service.	2.20	\$1,210.00
10/24/2018	Reviewed the filings and researched the law pertaining to default and preparation of the filing of the motion for default judgment	1.30	\$715.00
10/30/2018	Researched into the relief asked in the complaint. Judgment on merits-voiding of the deed transfer and attorney fees etc.	2.40	\$1,320.00
10/30/2018	Preparation of the motion for default judgment and filed it.	2.30	\$1,265.00
11/09/2018	Prepared the amended motion for default judgment and attached the affidavit of additional service of the complaint etc. upon Oumrao team.	1.20	\$660.00
11/20/2018	Appeared in the court, still, no Oumrao, apprized the Court the background and service etc., the court still not ready to enter default, but adjourned it to December 11, 2018.	2.60	\$1,430.00
11/26/2018	Prepared second motion for default and service of the same and filed the same.	2.60	\$1,430.00
11/29/2018	Prepared additional affirmation about service, google map, service on Oumrow meeting due process.	1.30	\$715.00
12/11/2018	Prepared for the court hearing	0.80	\$440.00
12/11/2018	Appeared in the court, the first appearance by the defendant [misleading statements], the judge in interest of justice granted time to respond by December 28, 2018. The judge struck off the default motion. All defs. to file an answer. Oumrow stated the name of his attorney stuck in traffic.	3.50	\$1,925.00
01/09/2019	Additional Affirmation in support of entry of Default judgment: review of the record, past filings and dates issued by the court. reviewed the motion to extend time as filed by Singh attorney ms. Collisson. Researched on the property 349 monroe street, brooklyn. Reviewed case law on Rule 55 (a) and (b). Researched case law on extension of time rule 9, FRBP 9006 and diligence of attorney.	5.90	\$3,245.00
01/10/2019	Continued Additional Affirmation in support of entry of Default judgment: Prepared the affirmation. Filed it with ecf. texted Ms. Collison obtained the email address. and fedexed the paperwork to ms. collison	1.90	\$1,045.00
01/14/2019	Prepared and filed a request for judicial notice, Collison violating ethics using client address as her address.	2.30	\$1,265.00
01/14/2019	Prepared for the court hearing, assembled all paperwork, and made notes.	0.70	\$385.00
01/15/2019	Appeared in the court, no answer filed by the defendants, no one appeared for the defendants. Ms. Collison not present in the court nor her clients, judge adjourned it to January 31, 2019.	2.40	\$1,320.00
01/22/2019	Receipt and review of Collison filing judicial notice request—response to the judicial notice application, claiming to end her professional engagement with Oumrow.	0.20	\$110.00
01/30/2019	Additional affirmation prepared to file for entry of default, as default was willful,	2.20	\$1,210.00

	Collision argue barge, phone number out of service and law backing entry of default based on misrepresentation.		
01/31/2019	Appeared in court, Oumrow given more time until February 20, 2019 to file responses to the complaint. Also, asked to have his lawyer file notice of appearance.	2.20	\$1,210.00
02/05/2019	Spoke to Mr. bronner again and prepared a certificate of noncompliance and filed it with the court	0.40	\$220.00
02/05/2019	Prepared and filed yet another affirmation for default entry for misrepresentation by Oumrow, Bronner was not retained by Oumrow	0.40	\$220.00
02/20/2019	Receipt and reviewed the objections by Bronner for Oumrow to the default. Reviewed the affidavit in support and Answer	0.60	\$330.00
02/21/2019	Prepared for the pretrial conference, issues with the answers, reviwed the case law related to the expedience of discovery, scheduling, Rule 1, 16, 26, 42, issues related to claims and bifurcation of the claims to expedite the resolution of the deed transfer and wrote a letter to the court.	3.90	\$2,145.00
02/21/2019	Court appearance at 3 pm, argued the issue of expediency. The judge had several questions about the transfer [seemed exhausted]	2.50	\$1,375.00
02/24/2019	Rule 12(c) research, judgment on pleadings. The scope of the Complaint causes of action. Amendment now, for 544 and 548 and new york state creditor debtor law 272, 274, 275.	3.90	\$2,145.00
02/24/2019	Research into Chapter 13 trustee to be brought in to start fraudulent conveyance actions, her fees, time pressure and impact on the existing cases.	1.40	\$770.00
02/24/2019	Started preparation of judgment on pleadings. Reviewed the pleadings, filing the court and talked to the sister of the debtor, the background.	1.70	\$935.00
02/25/2019	Rule 12(c) motion drafting begins. Standard of grant of motion. Affirmative defense ineffectuality, twombly standards to them? Research and writing of the motion.	4.80	\$2,640.00
02/25/2019	Pleading judgment motion, researched rule 201 judicial notice, governmental websites, admission party opponent.	2.50	\$1,375.00
02/26/2019	Judgment on pleadings: continued the drafting, the case laws and claims and their elements and how they are satisfied here.	3.20	\$1,760.00
02/26/2019	Motion pleadings continuing. FRE 901, Integral paperwork not mentioned. Attended to each claim and its backing by law, unjust enrichment, constructive trust, NY RAPL article 15, negligence and unconscionability, fraud conspiracy.	2.10	\$1,155.00
02/27/2019	Motion for judgement on pleadings: Finally completed the draft, took a break in between to speak to Wilson and Deslyn for 35 minutes, reverted back to draft and revised it and filed it and served all the parties to the case. Intricate issues addressed. Judgment demanded on 6 counts.	10.10	\$5,555.00
02/28/2019	Preparation of Initial disclosures under rule 26 and emailed it to the counselors and trustee and filed it with the court as a precautionary statment, so that otherside counsel sees its importance.	1.20	\$660.00

03/01/2019	Discovery demands: reviewed the interrogatory laws and production of documents. Prepared three set of interrogatories and document discovery and emailed it to Bronner and also mailed it.	5.70	\$3,135.00
03/18/2019	Ms. Deslyn came to the office with the records of home address, gas and utility bills etc. She spent more than an hour, putting papers in order, papers were reviewed and scanned.	0.80	\$440.00
03/18/2019	reviewed the filings, the motion for judgment, opposition by Bronner, prepared for the hearing tomorrow.	2.30	\$1,265.00
03/19/2019	Prepared for the hearing and attended the hearing on Wilson Motion for judgment on pleadings. The judge did not want to hear the case as she has several questions and asked about the discovery progress. Mr. Bonner asked for extension claiming that he was under the impression that once a motion for summary judgment is filed, the discovery stops. The judge revised the discovery schedule. the judge adjourned the hearing and would issue a new scheduling order. Judge attempted to negotiate off the record, however it was called off after an attempt failed.	3.50	\$1,925.00
03/25/2019	The court hearing, issues with the plan, domestic support affidavit missing, tax returns, trustee demanded missings...341 fixed again for May 1st, 2019.	4.30	\$2,365.00
03/25/2019	Deslyn came to the office inquiring about the case, discussed the plan.	0.40	\$220.00
03/26/2019	Receipt and review of the ASCB filings.	0.40	\$220.00
04/03/2019	Reviewed the dockets and checked the dates and scheduled it properly cross checked the dates and compliance.	0.40	\$220.00
04/11/2019	Review of the discovery requests, non-compliance by Ourmow Singh...sending of email to Bronner and meeting with Desylyn Johnson...review of the law regarding lack of discovery response and consequences.. and the start of preparation.	3.50	\$1,925.00
04/15/2019	Prepared for the motion for judgement on pleadings. reviewed the supplied discover attended the court hearing at 3 pm and came back to the office at 5: Was prepared but the judge adjourned it to June 4th...	6.80	\$3,740.00
06/04/2019	Researched on section 265-a equity theft laws of new yorka nd prepared an additional affirmation in support of judgment on pleadings and for judiciial notice and filed it with the court	4.30	\$2,365.00
06/04/2019	Prepared for hearing to be held at 3:00 PM. Prepared notes, printed out the statute 265a.	2.90	\$1,595.00
06/04/2019	Court heard arguments on the motion for judgment on pleadings, judge had questions has given more time to brief the issues.. and adjourned the motion to August 6th 2019.	2.50	\$1,375.00
06/17/2019	Amended motion for judgment on pleadings, the reassertion of the details, and the case laws.	4.40	\$2,420.00
06/19/2019	amending the motion for judgment on pleadings and filing it and sending it to Bronner	2.00	\$1,100.00
08/06/2019	Prepared for the hearing with notes.	0.70	\$385.00

08/06/2019	Attended the court, court at pains in trying to mediate. Motion, discovery, etc. new dates by the court. No answer filed, court grants more time. Court allowed Bronner to withdraw.	2.20	\$1,210.00
09/10/2019	Attended court hearing and the court. Court to treat the amended motion as a motion for summary judgment leave granted to supplement the papers.	2.80	\$1,540.00
12/15/2019	Preparation of the motion for summary judgment. Research on rule 56, the satisfaction of all standards, no disputed facts. Pleadings transparent, none disputed, any disputed issue no bearing on the motion at hand. Revised the case law on the elements of causes of action.	3.30	\$1,815.00
12/17/2019	Motion for summary judgment supplemental brief and undisputed facts prepared and filed with the court served electronically.	6.50	\$3,575.00
01/27/2020	Prepared the hearing for the summary judgment, no response filed.	0.70	\$385.00
01/28/2020	Prepared for the hearing, reviewed the case law, the notes, the pleadings	1.20	\$660.00
01/28/2020	Court hearing: attended court hearing. None appeared for Oum Row Singh. The judge was concerned with the delay and no appearance with several adjournments. I insisted that the court issue a direction that it is for a final hearing, last adjournment. the judge fixed march 11, 2020 for final arguments on the motion for judgment on pleadings and as well as the summary judgment. The judge felt that the motions are maintainable under the circumstances. I requested the court to at least grant the cancellation of the deed transfer. However, the judge fixed for the next date. Ms. Johnson was there. So was Katherine the bank's attorney who stated that the debtor is current with the adequate protection payments.	2.50	\$1,375.00
03/11/2020	preparation of the time to appear for the court arguments...motion for summary judgment and on pleadings etc.	1.50	\$825.00
03/11/2020	appeared telephonically before Judge Stong..the court heard and the case adjourned until April 14. The court shall issue an order to show cause for judgment..	0.50	\$275.00
05/19/2020	court hearing preparation.	0.50	\$275.00
07/13/2020	Prepared hte notice of settlement of proposed order reviewed nad filed it	3.20	\$1,760.00
08/11/2020	Court hearing, none from defendants.	0.80	\$440.00
09/09/2020	receipt and reviewed the court order signed. Decree for John Wilson.	0.30	\$165.00
09/20/2020	Reviewed the bankruptcy trustee motion to dismiss, researched on the issue of law of the case as the judge had iin the previous case ruled that no counseling was needed..prepared the oppostion and filed it with the court.	1.70	\$935.00
09/21/2020	prepared and appeared telephonically, long wait, before judge, the judge granted continuation fo the case, not to be dismissed, the plan to amended and served with an affidavit of service and DSO to be filed and Wilson to appear for the 341 meeting of creditors.	0.80	\$440.00
		Total	\$95,480.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
23	03/07/2021	\$95,480.00	\$0.00	\$95,480.00
Outstanding Balance				\$95,480.00
Total Amount Outstanding				\$95,480.00

The debtor signed a retainer of \$550/hr.